

Comments:

Before the POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Complaint Regarding Postal Service Offering
DOCKET # MC2012-26
ENHANCED SERVICES PRODUCT FOR
COMPETITIVE PO BOXES

COMMENTS OF Ship Station Plus
July 23, 2012

I am the owner of a small business that is a Commercial Mail Receiving Agency (CMRA) and have some comments about the United States Postal Service venturing into additional services for their PO Boxes. I am regulated as a CMRA by the United States Postal Service. While it has been determined that those boxes are competitive with our Private Mail Boxes (PMB)'s there are still distinct differences that set them apart from our Private Mail Boxes (PMB).

The new service of e-mail notification, being offered by the USPS, is a new service. The USPS has not been NOTIFYING their PO Box customers in the past. The service requires labor and technology to implement and maintain. These items have a cost and to say they are included in the base cost of a PO Box, when the service is new, contradicted the statements made by the USPS that they are already providing these services and that they are bundled into the PO Box rental fee. If the services were available in the past this maybe true but as new services there is a clear difference between the past and the present.

The second new service that is now available is street addressing for

private carrier delivery to the PO Box. I have a few objections to this.

1: The USPS claims that some companies will not deliver their products to a PO Box due to fraud. By masking the actual PO Box with a street address USPS is assisting in deceiving the merchants that they are not shipping goods to a PO Box. USPS is going to cause my business harm in the same manner that they are deceiving the merchant. Once it becomes common knowledge that the USPS is using the # sign to mask their PO Boxes, CMRA addressing will be swept up with that same brush and we will end up losing customers because of the required addressing standards that the USPS has imposed on CMRA's.

2: The acceptance of the packages at the street address causes a conflict with the USPS policy and procedures of getting a signature for accountable, insurable and registered mail products. The expectation and legal right of the mailer is being misused and deceived by the blanket acceptance form the USPS will require for the acceptance of mail at the street address. Is the acceptance of a package at the street address using the release sufficient to maintain the high standards of the registered mail piece, or the court recognized certified mail piece or even the USPS own standards for the insured mail piece?

3: Street addressing costs and logistics involved do not justify a no charge bundling of this service. By the USPS's own admission there is a cost involved in moving those packages from a receiving area to the delivery area. If there is cost then there needs to be postage to cover those costs. I cannot hand mail, directed to the local postmaster, to my letter carrier for internal delivery to a postmaster without placing a stamp on it, so everything handled by USPS personnel needs some sort of postage. While there has been a 25% increase in pricing nothing in the USPS filing shows a breakdown of costs to prove that the costs of implementing these specific new additional services is covered by the increase.

4: The USPS has not shown the detailed costs involved in providing the form completion, at the retail counter, the database support or the costs involved in physically storing these street address packages

for pickup at the retail counter. Additionally the time spent, at the retail counter, retrieving and handing said packages over to the mailbox holder have not been detailed.

In conclusion e-mail notification and street addressing as premium service doesn't seem to be what the public wants. With 66,000 mailbox customers canceling or not renewing in the first 6 months of the program it raises the question of what the PO Box customer really wants. In my experience the PO Box customer wants an inexpensive place to receive their mail and generally know when their mail is placed in the PO Box. These services are adding costs to people and businesses who are value purchasers rather than convenience and service customers.

The USPS regulates CMRA's denying the PMB holder a private mailbox of the ability to do change of addresses and forwarding of mail. The postal service has no problem of enhancing there P O Box service to directly compete on a like service yet using their regulatory ability to tie the hands of the small business that for years as offered this service as a value added service because of the ability to have all carriers delivery to the PMB. When it suited there needs they couldn't be bothered with other carriers and denied them access, but now they want to infringe on my private business to regulate me with a disadvantage yet gain the benefits of the value added service that I have given my customer all these years. The enhancements that USPS change the product they are offering and at the same time use their regulatory advantage to restrict my ability to adjust to the new business environment that the USPS wishes to impose on me. In addition, the 5-day delivery system that has repeatedly been publicly expressed as a desire of the reforming of the USPS will then create no Saturday mail delivery for me and my box holders yet benefit the postal service box holders because as the plan that is today, USPS has stated that PO box holders will retain the benefit of a 6 day delivery calendar. Another case of the regulatory control mechanism of the USPS on the CRMA's intentionally creating an unfair competitive advantage over those that they are regulating.

For all the reasons I have outlined, I feel that these services are not benefiting the USPS and in fact have the chance of further damaging

the high standards the the USPS operates under.

Thank you for your consideration on this matter.

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